



# **Vogel Paint & Wax Co.**

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Maurice, Iowa  
EPA ID#: IAD980630487  
SSID: 071M

# Purpose of Discussion

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- **Fifth Five-Year Review report under preparation**
- **Region 7 review process resulted in two comment letters:**
  - Solicited comments from IDNR received via July 15, 2019 letter
  - Unsolicited comments from Responsible Party Counsel received via July 9, 2019 email with letter attached
- **Discuss comments related to**
  - Modification to the IC instrument currently in place
  - RAO related to the point of compliance



# IC Background

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- September 1989 ROD states: Continued listing and restrictions associated with the State Abandoned or Uncontrolled Sites Registry until no further threat remains. (Currently known as State Registry of Hazardous Waste or Hazardous Substance Disposal Sites).
- July 1994 ESD: No changes identified to ICs.
- October 2000 ESD:
  - 1. Applied the Protected groundwater source classification to Vogel thereby requiring cleanup of contaminated groundwater to MCLs.
  - 2. Prohibited the use of on-site contaminated groundwater for drinking water purpose.
- August 2017: IDNR sent a letter to RP to “Develop and Implement an Environmental Covenant”.

# Regional Recommendation

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Region 7 recommends IC required:

1. To meet 2000 ESD requirement of preventing use of contaminated groundwater for either drinking water or other uses;
2. To meet long-term protectiveness to ensure no human health exposure from contaminated groundwater.

# Point of Compliance Background

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- September 1989 ROD states: Groundwater contamination detected in upper sand aquifer with well-defined plumes not expanding.
- July 1994 ESD: No changes identified to groundwater plume.
- October 2000 ESD states:
  - 1. Cleanup of groundwater to chemical-specific ARARs is not a reasonable goal.
  - 2. Localized groundwater in excess of ARARs is anticipated to exist for the foreseeable future.
  - 3. Contain the contaminated groundwater onsite and ensure contaminants in excess of drinking-water standards do not migrate offsite.

# Regional Recommendation

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Region 7 recommends cleanup of groundwater throughout the plume required:

1. To meet RAO as prescribed in the ROD and meet health based standards for drinking water and other uses;
2. To meet UU/UE and delisting from NPL.